

Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554

In the Matter of)
)
Administration of the North American)
Numbering Plan; Carrier Identification)
Codes (CICs))
)
)

COMMENTS OF STARTEC GLOBAL COMMUNICATIONS CORPORATION

Startec Global Communications Corporation (“Startec”), pursuant to the Public Notice in the above referenced proceeding, hereby submits these reply comments.

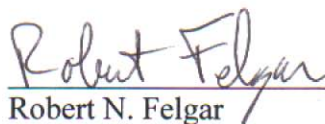
Startec supports Verizon’s position that “[a] carrier . . . should not be required to relinquish a code in use that is obtained in a merger or acquisition.” Verizon Comments at 6. Verizon states correctly that if a carrier is forced to relinquish a code obtained through a merger costly network changes would be necessary.

Such a requirement would also be harmful to the general public. Some codes are used to “enable[] callers to reach any carrier from any telephone” or to make so-called dial-around calls. *Administration of the North American Numbering Plan Carrier Identification Codes (CICs)*, Further Notice of Proposed Rulemaking, 13 FCC Rcd 3201 (1997). To place a dial-around call the caller “dial[s] a seven-digit carrier access code, or CAC, (‘101XXXX’) for which the last four digits (‘XXXX’) are that carrier’s unique four-digit Feature Group D CIC.” *Id.* Use of these codes is popular and provide a means for persons who do not wish to subscribe to a long distance service to nevertheless place long distance calls.

Forcing carriers to relinquish these CACs, if obtained through merger, would disrupt dial-around services and deny the public a valuable means of placing calls. In addition, it would be grossly unfair to companies that acquired such CACs through merger since in some instances the majority of the value of the acquired company is found in its dial-around service and associated CAC. If the Commission requires the acquiring carrier to relinquish the CAC, its investment would be rendered worthless.

For the foregoing reasons, the Commission should not require carriers to relinquish codes obtained in a merger or acquisition.

Respectfully submitted,

A handwritten signature in dark ink, appearing to read "Robert Felgar", is written over a horizontal line.

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